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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION

2019 MAR 27 AM 11:08

SENSITIVE

March 27, 2019

MEMORANDUM

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division *KDR*

BY: Kristin D. Roser
Compliance Branch

SUBJECT: Reason to Believe Recommendation -
Failure to File 48-Hour Notices under the Administrative Fine Program

Attached is the name of a principal campaign committee that has failed to timely file 48-hour notices with the Commission for contributions of \$1,000.00 or more received from the close of books for the Minnesota 2018 12 Day Pre-Primary Report up to 48 hours before the August 14, 2018 Primary Election in accordance with 52 U.S.C. § 30104(a) and 11 CFR. § 104.5(f). The committee, Klobuchar for Minnesota, represents a candidate who won the Primary Election. The committee is being referred for failing to timely file 48-hour notices for contributions totaling \$47,700.00.

A 48-hour notice is required to report all contributions of a \$1,000.00 or more, to any authorized committee of a candidate, including contributions from the candidate, loans from the candidate and other non-bank sources and endorsements or guarantees of loans from banks, as per 11 CFR § 104.5(f).

We have attached an information sheet which includes the contributor name, date of receipt and amount of the contributions for which a 48-hour notice was not timely filed.

Contributions for Which a 48-Hour Notice Was Not Timely Received¹

AF 3618

Committee ID: C00431353

Committee Name: Klobuchar for Minnesota

Report Type: 2018 October Quarterly Report (07/26/2018 – 09/30/2018)

48-Hour Reporting Period: 07/26/18 – 08/11/18

CONTRIBUTOR	DATE	AMOUNT
RUDD, DAVID	7/30/18*	\$1,000.00
RATNER, MARY	7/31/18*	\$1,950.00
NAYLOR, JOHN	8/1/18*	\$2,250.00
POWELL JOBS, LAURENE POWELL	8/1/18*	\$2,700.00
POWELL JOBS, LAURENE POWELL	8/1/18*	\$2,700.00
BECKER, JAMES	8/2/18*	\$1,000.00
MARITZ, KRISTINE MEREDITH	8/3/18*	\$1,000.00
AMERICAN DENTAL PAC	8/7/18	\$2,500.00
AMERICAN POSTAL WORKERS UNION AFL-CIO	8/7/18	\$2,500.00
ASSOCIATION OF EQUIPMENT MANUFACTURERS PAC	8/7/18	\$1,000.00
CAPELLA EDUCATION COMPANY PAC	8/7/18	\$1,400.00
CAPELLA EDUCATION COMPANY PAC	8/7/18	\$2,600.00
CONLIN, JAN M	8/7/18	\$1,300.00
CONLIN, JAN M	8/7/18	\$1,700.00
CUTLER, KENNETH LANCE	8/7/18	\$2,700.00
ECOLAB INC. POLITICAL ACTION COMMITTEE	8/7/18	\$5,000.00
FEDEX CORPORATION POLITICAL ACTION COMMITTEE (FEDEXPAC)	8/7/18	\$1,000.00
INGRAM BARGE COMPANY POLITICAL ACTION COMMITTEE	8/7/18	\$1,000.00
NATIONAL MULTIFAMILY HOUSING COUNCIL POLITICAL ACTION COMMITTEE	8/7/18	\$1,000.00
SAARIO, TERRY T	8/7/18	\$1,000.00
STARKEY PAC	8/7/18	\$1,000.00
STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY FEDERAL POLITICAL	8/7/18	\$1,000.00

¹ The Committee's faxed 48-hour notice for these contributions was received by the Secretary of the Senate's Office on 8/23/18 (Image 201808230200714263). However, in a Miscellaneous Electronic Document filed on 1/7/19, the Committee stated that it received a confirmation of the fax transmittal from eFax on 8/8/18 (Image 201901079143759693). The Committee attached this confirmation to the 48-hour notice filing.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 3618
Reason to Believe Recommendation -)
Failure to File 48-Hour Notices under the)
Administrative Fine Program: Klobuchar)
for Minnesota and M. Brigid)
McDonough, in her official capacity as)
treasurer)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election
Commission, do hereby certify that on April 04, 2019, the Commission decided
by a vote of 4-0 to take the following actions in AF 3618:

1. Find reason to believe that Klobuchar for Minnesota and M. Brigid McDonough, in her official capacity as treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that a civil money penalty of \$5,208 be assessed.
2. Send the appropriate letter.

Commissioners Hunter, Petersen, Walther, and Weintraub voted
affirmatively for the decision.

Attest:

April 4, 2019
Date

Dayna C. Brown
Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 4, 2019

M. Brigid McDonough, in official capacity as Treasurer
Klobuchar for Minnesota
P.O. Box 4146
St. Paul, MN 55104

C00431353
AF#: 3618

Dear Ms. McDonough:

The Federal Election Campaign Act of 1971, as amended, 52 U.S.C. § 30101, *et seq.* ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing the Federal Election Commission ("FEC") and the Secretary of State, as appropriate, of any contribution of \$1,000 or more, received by any authorized committee of the candidate after the 20th day, but more than 48 hours before, any election. 52 U.S.C. § 30104(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. *Id.* These notification requirements are in addition to all other reporting requirements. 52 U.S.C. § 30104(a). Our records indicate that Klobuchar for Minnesota did not submit 48-Hour Notices for contributions of \$1,000 or more, received between July 26, 2018 and August 11, 2018, totaling \$47,700, as required by 52 U.S.C. § 30104(a)(6)(A). Attachment 1.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On April 4, 2019, the FEC found that there is Reason to Believe ("RTB") that Klobuchar for Minnesota and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file the 48-Hour Notices. Based on the FEC's schedule of civil money penalties at 11 CFR § 111.44, the amount of your civil money penalty calculated at the RTB stage is \$5,208. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 2. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. The amount of the civil money penalty is \$146 for each non-filed notice plus 10 percent of the dollar amount of the contributions not timely reported. The civil money penalty increases by 25 percent for each prior violation. Send your payment of \$5,208 within forty (40) days of the finding, or by May 14, 2019.

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 1050 First Street, NE, Washington, DC 20002. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or May 14, 2019. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

1. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that Klobuchar for Minnesota and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate

action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

2. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Jamie Sikorsky in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1158) or (202) 694-1158.

On behalf of the Commission,

Ellen L. Weintraub

Ellen L. Weintraub
Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.44, the amount of your civil money penalty calculated at RTB is \$5,208 for the Minnesota 2018 12 Day Pre-Primary Report 48-Hour Notification Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Klobuchar for Minnesota

FEC ID#: C00431353

AF#: 3618

PAYMENT DUE DATE: May 14, 2019

PAYMENT AMOUNT DUE: \$5,208

Contributions for Which a 48-Hour Notice Was Not Timely Received¹

AF 3618

Committee ID: C00431353

Committee Name: Klobuchar for Minnesota

Report Type: 2018 October Quarterly Report (07/26/2018 – 09/30/2018)

48-Hour Reporting Period: 07/26/18 – 08/11/18

CONTRIBUTOR	DATE	AMOUNT
RUDD, DAVID	7/30/18*	\$1,000.00
RATNER, MARY	7/31/18*	\$1,950.00
NAYLOR, JOHN	8/1/18*	\$2,250.00
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POWELL JOBS, LAURENE POWELL	8/1/18*	\$2,700.00
BECKER, JAMES	8/2/18*	\$1,000.00
MARITZ, KRISTINE MEREDITH	8/3/18*	\$1,000.00
AMERICAN DENTAL PAC	8/7/18	\$2,500.00
AMERICAN POSTAL WORKERS UNION AFL-CIO	8/7/18	\$2,500.00
ASSOCIATION OF EQUIPMENT MANUFACTURERS PAC	8/7/18	\$1,000.00
CAPELLA EDUCATION COMPANY PAC	8/7/18	\$1,400.00
CAPELLA EDUCATION COMPANY PAC	8/7/18	\$2,600.00
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CONLIN, JAN M	8/7/18	\$1,700.00
CUTLER, KENNETH LANCE	8/7/18	\$2,700.00
ECOLAB INC. POLITICAL ACTION COMMITTEE	8/7/18	\$5,000.00
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INGRAM BARGE COMPANY POLITICAL ACTION COMMITTEE	8/7/18	\$1,000.00
NATIONAL MULTIFAMILY HOUSING COUNCIL POLITICAL ACTION COMMITTEE	8/7/18	\$1,000.00
SAARIO, TERRY T	8/7/18	\$1,000.00
STARKEY PAC	8/7/18	\$1,000.00

¹ The Committee's faxed 48-hour notice for these contributions was received by the Secretary of the Senate's Office on 8/23/18 (Image 201808230200714263). However, in a Miscellaneous Electronic Document filed on 1/7/19, the Committee stated that it received a confirmation of the fax transmittal from eFax on 8/8/18 (Image 201901079143759693). The Committee attached this confirmation to the 48-hour notice filing.

STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY FEDERAL POLITICAL ACTION COMMITTEE	8/7/18	\$1,000.00
TCF PAC	8/7/18	\$2,000.00
UNITED MINE WORKERS OF AMERICA - COAL MINERS POLITICAL ACTION COMMITTEE	8/7/18	\$1,000.00
WALDRON, ROBERT FRANCIS	8/7/18	\$2,700.00
WELLS, JOHN	8/7/18	\$2,700.00
	TOTAL	\$47,700.00

* These contributions were received by the Committee from the conduit on 8/6/18.

Proposed Civil Money Penalty: \$5,208 ((3 Notices Not Timely Filed at \$146 each) + (10% of the Overall Contributions Not Timely Reported))

PERKINS COIE

OFFICE OF
GENERAL COUNSEL

2019 MAY 14 PM 2:28

700 13th Street, NW
Suite 600
Washington, D.C. 20005-3960

Attachment 1
1 of 21

+1.202.654.6200
+1.202.654.6211
PerkinsCoie.com

May 14, 2019

Kate Sawyer Keane
KSKeane@perkinscoie.com
D. +1.202.434.1641
F. +1.202.654.9111

Federal Election Commission
Office of Administrative Review
1050 First Street NE
Washington, DC 20002

2019 MAY 14 PM 4:12

OFFICE OF
GENERAL COUNSEL

Re: AF # 3618

To Whom It May Concern:

On behalf of Klobuchar for Minnesota (the "Committee") and M. Brigid McDonough, in her official capacity as Treasurer, this letter is submitted in response to the Commission's letter of April 4, 2019. The Commission found Reason To Believe ("RTB") that the Committee failed to report contributions in excess of \$1,000 that it had received during the pre-primary period within 48 hours or receipt. The facts indicate that the Committee prepared and faxed all required reports to the Secretary of the Senate in the required time frame. The Commission should promptly dismiss this matter.

I. Facts

Klobuchar for Minnesota was the principal campaign committee of Senator Amy Klobuchar, United States Senator from the state of Minnesota. Compliance consultant Rebecca Groen prepares and submits the Committee's Federal Election Commission ("FEC" or the "Commission") filings under the authorization of the Committee's treasurer, M. Brigid McDonough. Senator Klobuchar was a candidate for re-election to the Senate in the 2018 election. Her primary election was held on August 14, 2018. *See* Groen Affidavit.

Between July 26 and August 11, 2018 the Committee received 64 contributions of \$1,000 or more. Upon receiving each of these contributions, Ms. Groen entered the contribution and the required contributor information on FEC Form 6. She faxed each Form 6 contribution report to the Secretary of the Senate at (202) 224-1851 using the online fax service eFax. All of the contributions were reported within 48 hours of receipt. *See* Groen Affidavit; Attachment A.

On August 8, 2018, at approximately 3:00 p.m. EDT (19:00 GMT) Ms. Groen faxed a contribution report identifying 26 contributions over \$1,000 to the Office of the Secretary of the Senate. *See id.* Ms. Groen received an email confirmation from eFax that the fax was successfully sent at 3:03 p.m. EDT (19:03 GMT). *Id.*

Ms. Groen had no reason to believe that the fax was not received by the Secretary of the Senate

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on August 8, 2018. In addition to receiving email confirmation that the report had been successfully transmitted, Ms. Groen was not aware of there being any problem with eFax that would have prevented it from successfully delivering the 48-hour contribution report to the Secretary of the Senate. Indeed Ms. Groen used eFax to submit six other contribution reports to the Secretary of the Senate between July 26 and August 11, 2018, and all were timely received by the Secretary of the Senate and posted to the Commission website. To her knowledge, this report was delivered successfully as well. *See Groen Affidavit.*

On August 22, 2018, during the course of a routine review of the Committee's filings on the Commission website, Ms. Groen noticed that the 48-hour contribution report she had filed on August 8, 2018 had not been posted to the Commission website. Ms. Groen promptly contacted the Secretary of the Senate's office, sent them an email informing them that the report may be missing, and attached a copy of the original filing along with a copy of the email confirmation from eFax demonstrating the report had been timely transmitted on August 8, 2018. *See Attachment B.* The Secretary of the Senate's office responded by email on the morning of August 23, 2018, stating that they had accepted the copy of the original 48-hour contribution report that Ms. Groen had attached to her email, and would "process it with the proof of transmission information." *Id.* The 48-hour contribution report subsequently appeared on the Commission website along with the eFax receipt, but with a filing date of August 23, 2018.

On December 2, 2018, the Commission sent the Committee and Ms. McDonough a Request For Additional Information ("RFAI") indicating that the Committee may have failed to timely file 48-hour contribution reports for 26 contributions in connection with the August 14, 2018 primary election. All of the contributions listed in the RFAI had been included in the report that Ms. Groen had faxed to the Secretary of the Senate on August 8, 2018 and that were posted on the Commission website on August 23, 2018. Ms. Groen responded to the RFAI on January 7, 2019 via electronic filing with a Form 99 Miscellaneous Report providing the explanation recounted above. Ms. Groen supplemented this response on January 29, 2019 with an additional Form 99 providing copies of the original 48-hour contribution report and the email from eFax confirming transmission of the report on August 8, 2018.

On April 4, 2019, the Commission sent the Committee and Ms. McDonough a letter indicating the Commission had found that there was RTB that the Committee had failed to file 48-hour contribution reports for the August 14, 2018 primary election. All of the contributions listed in the Commission's finding had been included in the report that Ms. Groen faxed to the Secretary of the Senate on August 8, 2018. *See Attachment A.*

II. Legal Background

Until September 21, 2018, the Federal Election Campaign Act required the principal campaign committee of candidates for federal office to notify the Secretary of the Senate of any

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contribution of \$1,000 or more received by the committee after the 20th day, but more than 48 hours before any election.¹ 52 U.S.C. § 30104(a)(6)(A). Such notification must be made within 48 hours of the receipt of the contribution. *Id.*

A committee must assert at least one of the following grounds for challenging a RTB finding or proposed civil monetary penalty for a violation of this requirement: (1) the Commission's RTB finding is based on a factual error including, but not limited to, that the committee timely filed the report; (2) the Commission improperly calculated the civil monetary penalty; or (3) the committee (i) used best efforts to file in a timely manner in that the committee was prevented from filing in a timely manner by reasonably unforeseen circumstances that were beyond the control of the committee, and (ii) the committee filed no later than 24 hours after the end of these circumstances. 11 C.F.R. § 111.35(b).

With respect to the first prong of the "best efforts" defense, reasonably unforeseen circumstances include, but are not limited to, (1) a failure of Commission computers or Commission-provided software; (2) a widespread disruption of information transmissions over the Internet not caused by any failure of the Commission's or respondent's computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 C.F.R. § 111.35(c). They also include "delivery failures caused by mail/courier services." 72 Fed. Reg. 31,440. They do not include, however, failure of the committee's own computer, software, or Internet service. 11 C.F.R. § 111.35(d).

With respect to the second prong of the "best efforts" defense, that the committee files no later than 24 hours after the end of the unforeseen circumstances, the Commission has further explained that "[u]pon discovering the failure [to file], the Committee [must] promptly [take] all reasonable additional steps to expeditiously file any unfilled reports and correct any inaccurate reports." *Statement of Policy Regarding Treasurers' Best Efforts to Obtain, Maintain, and Submit Information as Required by the Federal Election Campaign Act*, 72 Fed. Reg. 31,438, 31,440 (June 7, 2007).

The "best efforts" defense is an objective test and employs a "reasonable person standard." 72 Fed. Reg. 14,662, 14,664 (Mar. 29, 2007).

¹ On September 21, 2018 the Energy and Water, Legislative Branch, and Military Construction and Veterans Affairs Appropriations Act of 2019 was enacted, which included a statutory provision making the FEC the official point of entry for all filings required under the Federal Election Campaign Act (FECA). See 52 U.S.C. § 30102(g); FEC Record, 'Senate committees must file with FEC and follow mandatory e-filing rules' (September 21, 2018) available at <https://www.fec.gov/updates/senate-committees-must-file-fec-and-follow-mandatory-e-filing-rules/>.

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III. Legal Analysis

Because Senator Klobuchar's primary election was held on August 14, 2018, her principal campaign committee was required to report to the Secretary of the Senate all contributions of \$1,000 or more, received between July 26 and August 11, 2018, within 48 hours of receipt. The facts demonstrate that the Committee did just this—the proof of transmission from eFax confirms that Ms. Groen faxed the relevant 48-hour contribution report to the Secretary of the Senate on August 8, 2018, within the required 48-hour window—and that the Commission's RTB finding is therefore based on a factual error because the report was timely filed.

If the relevant 48-hour contribution report was *not* received by the Secretary of the Senate on August 8, this was caused by circumstances that were reasonably unforeseen and beyond the control of the Committee. After sending the 48-hour contribution report, Ms. Groen received email confirmation from eFax that the report had been successfully sent. She had not experienced any problems with eFax previously that might indicate that the service may not be working properly and all previous and subsequent reports transmitted to the Secretary of the Senate using eFax during the 2018 primary 48-hour reporting period were successfully transmitted and timely received. Thus, if the relevant 48-hour contribution report was not successfully delivered to the Office of the Secretary of the Senate, it was not due to the failure of the Committee's computer, software, or internet service, but rather due to some other equipment or delivery failure. *See* 11 C.F.R. §§ 111.35(c), (d)(4). And, because Ms. Groen had every indication that eFax and the Secretary of the Senate's equipment was working properly, she could not have reasonably foreseen that the report would not be received by the Secretary of the Senate.

The Committee has also met the second prong of the "best efforts" test by providing the Commission with the required information within 24 hours after the circumstances preventing disclosure were removed. 11 C.F.R. § 111.35(b)(3). On August 8, the Committee faxed the required report to the Secretary of the Senate in a timely manner. It had no reason to believe that the report may not have been received until Ms. Groen reviewed the Committee's filings on the Commission's website on August 22, 2018. As soon as the Committee became aware that the report may have not been received and, thus, the circumstance preventing disclosure was lifted, Ms. Groen immediately contacted the Secretary of the Senate to notify them that the report may be missing and provided evidence that the report had been timely transmitted. As a result, the report was filed with the Commission less than 24 hours later. In addition, the Committee timely responded to the RFAI explaining the circumstances of the filing and re-submitted the proof of its timely transmission. Through these actions the Committee "promptly took all reasonable additional steps to expeditiously file." 72 Fed. Reg. 31,440.

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IV. Conclusion

As described above, the Committee took all reasonable steps to timely file the relevant 48-hour contribution report as required by 52 U.S.C. § 30104(a)(6)(A). Either the Office of the Secretary of the Senate did receive the report on August 8, 2018, in which case the RTB finding is based on a factual error, or the Committee was prevented from filing in a timely manner by reasonably unforeseen circumstances that were beyond the control of the Committee and the Committee remediated the situation immediately after the end of these circumstances. Accordingly, the Commission should dismiss this matter immediately.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Kate Sawyer Keane', followed by a long horizontal line extending to the right.

Kate Sawyer Keane
Daniel B. Nudelman
Counsel to Klobuchar for Minnesota



FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

RECEIVED
FEC MAIL CENTER
2019 MAY 14 PM 12:58

STATEMENT OF DESIGNATION OF COUNSEL
Please use *one* form for each Respondent/Entity/Treasurer
FAX (202) 219-3923

MUR # AF 3618

NAME OF COUNSEL: Kate Sawyer Keane & Daniel Nudelman

FIRM: Perkins Cole LLP

ADDRESS: 700 Thirteenth St., N.W. Suite 600

Washington, DC 20005

TELEPHONE- OFFICE (202) 654-6296

FAX (202) 654-9980 Web Address www.perkinscoie.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

5-10-2019 M Bridgid McDonough Treasurer
Date Respondent/Agent Signature Title (Treasurer/Candidate/Owner)

RESPONDENT: M Bridgid McDonough
(Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: PO Box 4146
(Please Print)

Saint Paul, Minnesota 55104

TELEPHONE- HOME ()

BUSINESS (612) 281 4555

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation



FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

GENERAL COUNSEL

2019 MAY 14 PM 2:28

STATEMENT OF DESIGNATION OF COUNSEL
Please use **one** form for each Respondent/Entity/Treasurer.
FAX (202) 219-3923

MUR # AF 3618

NAME OF COUNSEL: Kate Sawyer Keane & Daniel Nudelman

FIRM: Perkins Coi eLLP

ADDRESS: 700 Thirteenth St., N.W. Suite 600

Washington, DC 20005

TELEPHONE- OFFICE (202) 654-6295

FAX (202) 654-9980

Web Address www.perkinscoi.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

5-13-2019 Mary Kargal McLoughlin Treasurer
Date Respondent/Agent Signature Title (Treasurer/Candidate/Owner)

RESPONDENT: Klobuchar for Minnesota

(Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: PO Box 4146
(Please Print)

Saint Paul, Minnesota 55104

TELEPHONE- HOME ()

BUSINESS (612) 281 4555

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation

OFFICE OF
GENERAL COUNSEL
2019 MAY 14 PM 2:29

----- Forwarded message -----

From: Omorogieva, Erica (Secretary) <Erica_Omorogieva@sec.senate.gov>
Date: Thu, Aug 23, 2018 at 9:05 AM
Subject: RE: Question Regarding 48 Hour Notice Filing
To: Rebecca Groen <groen.becky@gmail.com>

Becky,

I have accepted the following 48-hour notice that you attached, and will process it with the proof of transmission information.

Erica

From: Rebecca Groen <groen.becky@gmail.com>
Sent: Wednesday, August 22, 2018 3:36 PM
To: Omorogieva, Erica (Secretary) <Erica_Omorogieva@sec.senate.gov>
Subject: Question Regarding 48 Hour Notice Filing

Hello, I am writing on behalf of Klobuchar for Minnesota, following up on a 48 hour notice filed by the committee on 8/8/2018. After reviewing the public documents available on the FEC website, it has come to our attention that this report may be missing. I have attached here the original filing, as well as the confirmation page from our efax service showing the date of transmission.

Please let me know if there is anything more I can do.

Sincerely,

Becky Groen

--

Becky Groen
Campaign Compliance Solutions

Mobile: 612-281-4555

becky@compliancemn.com

--

Becky Groen
Campaign Compliance Solutions

Mobile: 612-281-4555

becky@compliancemn.com

100022724017

FAX COVER SHEET

TO	Secretary of the Senate, Office of Public Records
COMPANY	
FAX NUMBER	12022241851
FROM	Rebecca Groen
DATE	2018-08-08 18:58:07 GMT
RE	48 Hour Notice

COVER MESSAGE

Attached please find the 48 hour notice form for Klobuchar for Minnesota, FEC ID C00431353

48-HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Form 580 for Instructions)

To be used to report all contributions (including loans) of \$1000 or more received within 48 days of the election.

1. NAME OF COMMITTEE IN FULL Klobuchar for Minnesota			
ADDRESS (Street and City) P.O. Box 4100			
CITY St Paul	STATE MN	ZIP CODE 55101	
2. NAME OF CANDIDATE Klobuchar, Amy...		3. OFFICE SOUGHT (House and District) Senate MN 00	4. REGISTRATION NUMBER 02X431353
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> YES, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE FILING FILED ON			
A. FULL NAME American Dental PAC		Name of Employer	Date (month, day, year)
MAILING ADDRESS 1111 14TH STREET, NW SUITE 1100 WASHINGTON DC 20005		Transaction ID: C22805220	Amount 2500.00
B. FULL NAME AMERICAN POSTAL WORKERS UNION AFL-CIO		Name of Employer	Date (month, day, year)
MAILING ADDRESS 1300 L STREET NW WASHINGTON DC 20005		Transaction ID: C22865233	Amount 2500.00
C. FULL NAME ASSOCIATION OF EQUIPMENT MANUFACTURERS PAC		Name of Employer	Date (month, day, year)
MAILING ADDRESS 1100 VERMONT AVENUE NW SUITE 450 WASHINGTON DC 20005		Transaction ID: C22865223	Amount 1000.00
D. FULL NAME Becker, James, . .		Name of Employer Not Employed	Date (month, day, year)
MAILING ADDRESS 04 Juniper Road Belmont MA 02478		Transaction ID: C22804400A	Amount 1000.00
E. FULL NAME CAPELLA EDUCATION COMPANY PAC		Name of Employer	Date (month, day, year)
MAILING ADDRESS 225 SOUTH 6TH STREET 9TH FLOOR MINNEAPOLIS MN 55402		Transaction ID: C22865230	Amount 1400.00
SIGNATURE (optional) McDonough, J. David		DATE 08/08/2010	For further information contact: Federal Election Commission 990 E Street, NW, Washington, DC 20543 Tel: 800-424-9530, Local 202-694-1100

Any false statement made herein is a violation of the Federal Election Campaign Act and may be subject to criminal and civil penalties. The purpose of this form is to provide information to the public regarding contributions received by candidates for federal office. It is not intended to be used for any other purpose.

FEC FORM 6
(Revised 03/2010)

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Reverse Side for Instructions)

Be so used to report all contributions (including loans) of \$100 or more received within 48 hours of the election.

1. NAME OF COMMITTEE IN FULL Klobuchar for Minnesota			
2. CITY, STATE, AND ZIP CODE St Paul MN 55104			
3. NAME OF CANDIDATE Klobuchar, Amy, D		4. FEEDBACK NUMBER C00431359	
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> YES, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON			
6. FULL NAME, MAILING ADDRESS AND ZIP CODE CAPELLA EDUCATION COMPANY PAC 225 SOUTH 6TH STREET 8TH FLOOR MINNEAPOLIS MN 55402		Name of Employer Transaction ID : C22865231 Occupation 2600.00	
6. FULL NAME, MAILING ADDRESS AND ZIP CODE Carp, Bert, W., 601 Pennsylvania Ave. Washington DC 20004		Name of Employer Assignment Government Strategies Transaction ID : C2286522A Occupation Government relations 200.00	
6. FULL NAME, MAILING ADDRESS AND ZIP CODE Carp, Bert, W., 601 Pennsylvania Ave. Washington DC 20004		Name of Employer Assignment Government Strategies Transaction ID : C2286526A Occupation Government relations 600.00	
6. FULL NAME, MAILING ADDRESS AND ZIP CODE Conlin, Jan, M., 1710 Knox Ave S Minneapolis MN 55403-2833		Name of Employer Crest Conlin LLP Transaction ID : C22865212 Occupation Attorney 1700.00	
6. FULL NAME, MAILING ADDRESS AND ZIP CODE Conlin, Jan, M., 1710 Knox Ave S Minneapolis MN 55403-2833		Name of Employer Crest Conlin LLP Transaction ID : C22865213 Occupation Attorney 300.00	

continuation page

Any false or misleading statement made under the Federal Election Campaign Act may be subject to criminal or civil penalties or both.

FEC FORM 6
(Revised 07/2011)

(See Page 130 Skip 14 Instructions)

[illegible]

NAME OF COMMITTEE OR FULL Klobuchar for Minnesota		CITY, STATE, AND ZIP CODE St Paul MN 55106		CONTINUATION PAGE
NAME OF CANDIDATE Klobuchar, Amy...		OFFICE OR OFFICE (State and District) Senate MN 00		STATE OF MINNESOTA CAMPAIGN NUMBER C00431553
IS THIS AN ASSIGNMENT? <input checked="" type="checkbox"/> YES, THIS IS A NOW FILING <input type="checkbox"/> YES, IT ARCHIVES TO BE LATER FILED OR				
A. FULL NAME, MAILING ADDRESS AND ZIP CODE Cutler, Kenneth, Lance, 19 Circle W Edina MN 55438-1312		Name of Employer Orsay R Whitney Transaction ID: C22865216 Occupation Attorney	Date (month, day, year) 08/07/2018	Amount 2700.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE ECOLAB INC. POLITICAL ACTION COMMITTEE 370 Wyandale St. Paul MN 55102		Name of Employer Transaction ID: C22865221 Occupation	Date (month, day, year) 08/07/2018	Amount 5000.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE FEDEX CORPORATION POLITICAL ACTION COMMITTEE (FEDEXPAC) 942 S SHALY GROVE ROAD MEMPHIS TN 38120		Name of Employer Transaction ID: C22865232 Occupation	Date (month, day, year) 08/07/2018	Amount 1000.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE INGRAM BARGE COMPANY POLITICAL ACTION COMMITTEE ONE BELLE MEADE PL 4400 HARDING RD NASHVILLE TN 37205		Name of Employer Transaction ID: C22865228 Occupation	Date (month, day, year) 08/07/2018	Amount 1000.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE Maritz, Kristine, Meredith, 5360 1st Ave S Minneapolis MN 55419		Name of Employer MCCO Transaction ID: C22864138A Occupation Consultant	Date (month, day, year) 08/06/2018	Amount 1000.00

1. The first part of the document is a title page. It contains the title of the document, the author's name, and the date of the document. The title is "The First Part of the Document". The author's name is "John Doe". The date is "1/1/2020".

FEC FORM 6
(Instructions on Page 2)

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Reverse Side for Instructions)

Do not need to report off contributions (reporting based on \$1000 or more received within 27 days of the election.)

NAME OF COMMITTEE OR POLITICAL ACTION COMMITTEE Klobuchar for Minnesota <small>Business purpose only (page 1) 703 644 4146</small>			
CITY, STATE, AND ZIP CODE St Paul MN 55104		continuation page	
NAME OF CANDIDATE Klobuchar, Amy,		FEC IDENTIFICATION NUMBER C00431353	
DO YOU AN AGREEMENT? <input checked="" type="checkbox"/> NO THIS IS A NEW FILING <input type="checkbox"/> YES IT AMENDS THE PREVIOUS FILING			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE Naylor, John, , 2408 Lafayette Road Wayzata MN 55391		Name of Employer Medica Transaction ID : C22805258A Occupation Executive	
B. FULL NAME, MAILING ADDRESS AND ZIP CODE Naylor, John, , 2408 Lafayette Road Wayzata MN 55391		Name of Employer Medica Transaction ID : C22864291A Occupation Executive	
C. FULL NAME, MAILING ADDRESS AND ZIP CODE NATIONAL MULTIFAMILY HOUSING COUNCIL POLITICAL ACTION COMMITTEE 1775 EYE ST. NW SUITE 1100 WASHINGTON DC 20006		Name of Employer Transaction ID : C22865322 Occupation President	
D. FULL NAME, MAILING ADDRESS AND ZIP CODE Powell Jobs, Laurene, , 556 Bryant Street #280 Palo Alto CA 94301		Name of Employer Emerson Collective Transaction ID : C22864268A Occupation President	
E. FULL NAME, MAILING ADDRESS AND ZIP CODE Powell Jobs, Laurene, , 555 Bryant Street #258 Palo Alto CA 94301		Name of Employer Emerson Collective Transaction ID : C22865243A Occupation President	

Any individual or legal entity that has contributed to the campaign of a candidate for federal office must file this form with the Federal Election Commission (FEC) by the deadline for filing the campaign report for the election in which the contribution was made. This form is required for all contributions of \$1000 or more, regardless of whether the contribution was made in cash or by check, credit card, or other means. This form is also required for all contributions of any amount made by a foreign national, a foreign corporation, or a foreign government. This form is also required for all contributions of any amount made by a domestic corporation, partnership, or other entity that is not an individual. This form is also required for all contributions of any amount made by a domestic corporation, partnership, or other entity that is not an individual. This form is also required for all contributions of any amount made by a domestic corporation, partnership, or other entity that is not an individual.

FEC FORM 6
(Rev. 07/2011)

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Reverse Side for Instructions)

Report used to report all contributions (including loans) of \$1000 or more received within 48 hours of the election.

1. NAME OF COMMITTEE OR FULL Klobuchar for Minnesota			
ADDRESS (Number and Street) Apt. Box #100			
CITY, STATE, AND ZIP CODE St Paul MN 55104			
2. NAME OF CANDIDATE Klobuchar, Amy...		3. OFFICE SECTOR (State and District) Senate MN 03	
4. FEC IDENTIFICATION NUMBER C00431353			
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE FILING FILED ON _____			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE Ratner, Mary... 220 Marmona Dr. Marlo Park CA 94023		B. NAME OF EMPLOYER Not employed Transaction ID: C27864869A Occupation Not employed	
C. FULL NAME, MAILING ADDRESS AND ZIP CODE Rudd, David... 3848 Macomb St NW Washington DC 20010		D. NAME OF EMPLOYER Palmetto Group Transaction ID: C22864030A Occupation Consultant	
E. FULL NAME, MAILING ADDRESS AND ZIP CODE Saario, Terry, T... 34 Park Ln Minneapolis MN 55416		F. NAME OF EMPLOYER N/A Transaction ID: C228663213 Occupation Retired	
G. FULL NAME, MAILING ADDRESS AND ZIP CODE STARKEY PAC 6500 WASHINGTON AVE S EDEN PRAIRIE MN 55344		H. NAME OF EMPLOYER Transaction ID: C22865218 Occupation	
I. FULL NAME, MAILING ADDRESS AND ZIP CODE STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY FEDERAL POLITICAL ACTION COMMITTEE ONE STATE FARM PLAZA C/O MARK SCHWANDERGER, TREASURER BLOOMINGTON IL 61710		J. NAME OF EMPLOYER Transaction ID: C22865220 Occupation	

continuation page

Any contribution to this report must be made by the 48th day after the election. The Federal Election Commission may not be held responsible for any errors in the purpose of collecting contributions or for any other matter. This page is not subject to any other restrictions to which contributions may be subject.

FEC FORM 6
(Instructions)

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(9-40 Release 510 for instructions)

Be sure to report all contributions (including loans) of \$1000 or more received within 48 hours of the election.

NAME OF COMMITTEE OR FULL Klobuchar for Minnesota			
ADDRESS (street and 1000) PO Box 4148			
CITY, STATE, AND ZIP CODE St Paul MN 55104			
NAME OF CANDIDATE Klobuchar, Amy...		DATE RECEIVED (month, day, year) 08/07/2018	
DATE OF NOTICE 08/07/2018		AMOUNT 2000.00	
1. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON _____			
2. FULL NAME, MAILING ADDRESS AND ZIP CODE TCF PAC 601 MARQUETTE AVENUE MINNEAPOLIS MN 55402			
Name of Employer Transaction ID : C22805217 Occupation		Date (month, day, year) 08/07/2018	
Name of Employer Transaction ID : C22865227 Occupation		Date (month, day, year) 08/07/2018	
Name of Employer Cameron's Coffee Transaction ID : C22865216 Occupation Executive		Date (month, day, year) 08/07/2018	
Name of Employer John Wells Productions Transaction ID : C22865216 Occupation Producer		Date (month, day, year) 08/07/2018	
Name of Employer Occupation		Date (month, day, year) Amount	

continuation page

Any filer who is required to file this notice must also file a copy of this notice with the Federal Election Commission (FEC) by the same date as the notice is filed with the state or local election authority. The FEC Form 6 is available at www.fec.gov.

FEC FORM 6
(Instructions 9/12/2011)



Rebecca Groen <groen.becky@gmail.com>

Successful transmission to 12022241851. Re: 48 Hour Notice

send@mail.efax.com <send@mail.efax.com>
To: groen.becky@gmail.com

Wed, Aug 8, 2018 at 2:03 PM



Hello Rebecca,

Your fax was successfully sent to 12022241851 by eFax.

Fax Details**Date:** 2018-08-08 19:03:34 (GMT)**Number of Pages:** 7**Length of Transmission:** 276 seconds**Receiving Machine Fax ID:** 202-224-1851

If you have any questions, please visit our online help center or contact Customer Support.

Thank you for choosing eFax.

Sincerely,
The eFax Team

Special Offer: Too busy to handle all your business calls? Let eVoice answer, manage and route your phone calls, 24/7. Try it free for one month!

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6922 Hollywood Blvd., Los Angeles, CA 90028

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BEFORE THE
FEDERAL ELECTION COMMISSION

GENERAL COUNSEL

2019 MAY 14 PM 2: 29

IN RE

Klobuchar for Minnesota

and

M. Brigid McDonough, as Treasurer

AF #3618

AFFIDAVIT OF REBECCA GROEN

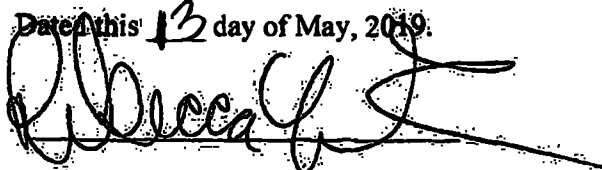
1. My name is Rebecca Groen. I am a compliance consultant for the Treasurer of Klobuchar for Minnesota, the principal campaign committee of United States Senator Amy Klobuchar during the 2018 election.
2. Senator Klobuchar was a candidate for re-election to the United States Senate in the 2018 election. Her primary election was held on August 14, 2018.
3. Between July 26, 2018 and August 11, 2018, Klobuchar for Minnesota received sixty-four contributions of \$1,000 or more. Twenty-six of these contributions are identified on Attachment 1 to the Commission's Reason to Believe letter dated April 4, 2019.
4. I reported each of these contributions on FEC Form 6 and used the online fax service eFax to transmit each Form 6 to the the Secretary of the Senate at (202) 224-1851 within 48 hours of receiving each contribution.
5. At approximately 3:00pm EDT on August 8, 2018 I used eFax to transmit a Form 6 identifying the twenty six contributions referenced above to the Secretary of the Senate, and received an email from eFax at 3:03pm EDT confirming that the Form 6 had been successfully

transmitted. These documents are attached as "Attachment A."

6. I used eFax to transmit Form 6 48-hour contribution reports to the Secretary of the Senate both before and after August 8, 2018, including six other 48-hour contribution reports between July 26 and August 11, 2018. To my knowledge all were sent successfully to the Secretary of the Senate. I was not aware at the time, nor am I aware now, of any problem with the eFax service that would have prevented the August 8, 2018 Form 6 from being delivered to the Secretary of the Senate.

7. On August 22, 2018, during a routine review of Klobuchar for Minnesota's filings on the FEC's public website, I noticed that the Form 6 48-hour contribution report that I transmitted to the Secretary of the Senate on August 8, 2018 had not been posted to the Commission website. I contacted the Office Secretary of the Senate about the missing Form 6 report and emailed the Office a copy of the original filing of the report along with a copy of the email confirmation from eFax confirming that the report had been timely transmitted on August 8, 2018. The Office of the Secretary of the Senate responded by email on the morning of August 23, 2018, stating that they had accepted the copy of the original Form 6 attached to my email and that they would process it with the eFax email proof of transmission. This email correspondence is attached as "Attachment B."

I declare under penalties of perjury that the foregoing is true and correct to the best of my present knowledge, information and belief. Dated this ²¹13 day of May, 2019.



Rebecca Groen



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 2019

**REVIEWING OFFICER RECOMMENDATION
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 3618 – Klobuchar for Minnesota and M. Brigid McDonough, in her official capacity as Treasurer (C00431353)

Summary of Recommendation

Terminate the proceedings in accordance with 11 C.F.R. § 111.37(b) and close the file.

Reason-to-Believe Background

In connection with the 2018 Minnesota Primary Election held on August 14, 2018, the respondents were required to file 48-Hour Notices of Contributions/Loans ("48-Hour Notices") for contributions of \$1,000 or more received between July 26, 2018 and August 11, 2018.

On April 4, 2019, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file a 48-Hour Notices for 26 contributions totaling \$47,700 and made a preliminary determination that the civil money penalty was \$5,208 based on the schedule of penalties at 11 C.F.R. § 111.44. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on April 4, 2019 to notify them of the Commission's RTB finding and civil money penalty.

Legal Requirements

The Federal Election Campaign Act ("Act") requires that the principal campaign committee of a candidate for the office of U.S. Senator must notify the Secretary of the Senate, in writing, of any contribution of \$1,000 or more received after the 20th day but more than 48 hours before an election. The principal campaign committee must notify the Secretary of the Senate within 48 hours of receipt of the contribution. The 48-hour notification shall be in addition to all other reporting requirements under the Act. 52 U.S.C. § 30104(a)(6)(A) and 11 C.F.R. § 104.5(f). All reports required to be filed by the principal campaign committee of a candidate for the office of U.S. Senator shall be filed with the Secretary of the Senate. 52 U.S.C. § 30102(g) and 11 C.F.R. § 105.2.¹ The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

¹ Effective September 21, 2018, the Legislative Branch Appropriations Act, 2019, Public Law 115-244, sec. 102, 132 Stat. 2897, 2926 (2018) amended the FECA to require that all reports, designations, and statements required to be filed under FECA must be filed with the Commission.

Summary of Respondents' Challenge

On May 14, 2019, the Commission received the written response ("challenge") from the respondents' Counsel, which included supporting documentation and the Declaration of Rebecca Groen, the Committee's compliance consultant. Counsel states the Committee did timely submit the required 48-Hour Notice to the Secretary of the Senate's Office of Public Records ("OPR").

Counsel further explains that Ms. Groen timely submitted the 48-Hour Notice on August 8, 2018 via eFax² to OPR. Within minutes of transmitting the fax, Ms. Groen received an email from eFax confirming the fax was successfully sent. "Ms. Groen had no reason to believe the fax was not received by the Secretary of the Senate on August 8, 2018." Ms. Groen was not aware of any problems with eFax that would have prevented the submission. Further, Ms. Groen had successfully used eFax to submit 6 other 48-Hour Notices between July 26 and August 11, 2018, which were all delivered timely to OPR.

On August 22, 2018, Ms. Groen recognized the August 8 submission was not available on the Commission's website. She contacted OPR and submitted a copy of the original transmission with eFax confirmation. On August 23, 2018, OPR responded to Ms. Groen and indicated they would process the 48-Hour Notice with a filing date of August 23, 2018.

On December 2, 2018, the Commission sent a Request for Additional Information ("RFAI") regarding the contributions for which a 48-Hour Notice was not received. On January 7 and 29, 2019, the Committee filed responses explaining the circumstances.

Counsel states that the Commission's RTB finding is based on a factual error because the report was timely filed. Further, if OPR did not receive the submission on August 8, 2018...

...this was caused by circumstances that were reasonably unforeseen and beyond the control of the committee...[I]t was not due to the failure of the Committee's computer, software, or internet service, but rather due to some other equipment or delivery failure. And, because Ms. Groen had every indication that eFax and the Secretary of the Senate's equipment was working properly, she could not have reasonably foreseen (sp) that the report would not be received by the Secretary of the Senate.

Counsel also notes that the Committee filed the report within 24 hours of becoming aware of the missing filing; therefore, it also met the second prong of the "best efforts" test.

Analysis

On December 2, 2018, RAD sent an RFAI to the Committee regarding the contributions for which a 48-Hour Notice was not timely received. On January 7, 2019, the Committee submitted a Form 99 (Miscellaneous Electronic Submission) in response to the RFAI. On January 29, 2019, the Committee submitted a Form 99 (Miscellaneous Text Submission) to provide supporting documentation. The Committee explained all contributions included in the

² eFax is an online fax service which allows its users to send and receive faxes via email, online portal, or mobile device. www.efax.com

RTB finding were included in its August 8, 2018 eFax transmission to OPR and provided the eFax confirmation email indicating this transmission was successfully delivered.

Prior to RTB, RAD requested OPR provide additional details regarding its receipt of the Committee's 48-Hour Notice in question. In response, OPR confirmed it did not receive the Committee's August 8, 2018 submission. OPR noted that it only received the Committee's emailed submission of the 48-Hour Notice, which it processed on August 23, 2018.

The Reviewing Officer notes that the Committee successfully used eFax to transmit 48-Hour Notices to OPR on July 29, July 31, August 2, and August 6, 2018. Therefore, the Reviewing Officer recognizes the Committee had no reason to believe there would be any transmission errors when using eFax to transmit the 48-Hour Notice on August 8, 2018.

The Reviewing Officer also notes that the eFax confirmation email indicates that Rebecca Groen's 7-page fax to 202-224-1851 was successfully sent on August 8, 2018. The Reviewing Officer confirms that 202-224-1851 was the correct fax number for submitting documents to OPR. In addition, the page count (7) aligns with the August 23, 2018 submission indicating the original submission included 6 pages of contributions on the 48-Hour Notice and 1 fax cover memo page. Therefore, the Reviewing Officer recognizes the Committee had no reason to believe the 48-Hour Notice was not successfully transmitted to OPR on August 8, 2018.

The supporting documents provided in the challenge and Declaration of Rebecca Groen suggest that all contributions included in the RTB finding were included in the Committee's August 8, 2018 transmission to OPR. There is a lack of evidence to suggest why the August 8, 2018 fax was not successfully delivered to and/or processed by OPR. Had this 48-Hour Notice been successfully delivered to and processed by OPR on August 8, 2018, the 48-Hour Notice covering the contributions in question would have been considered timely. Therefore, the Reviewing Officer recommends that the Commission terminate the proceedings in accordance with 11 C.F.R. § 111.37(b) and close the file.

OAR Recommendations

1. Terminate the proceedings in AF# 3618 that Klobuchar for Minnesota and M. Brigid McDonough, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and close the file; and
2. Send the appropriate letter.

Attachments

- Attachment 1 –
- Attachment 2 –
- Attachment 3 – Declaration from RAD
- Attachment 4 – Declaration from OAR

DECLARATION OF KRISTIN D. ROSER

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to Klobuchar for Minnesota:
 - A) Request for Additional Information for the Amended 2018 October Quarterly Report, dated December 2, 2018, referencing the missing 48-Hour Notices (sent via electronic mail to: info@amyklobuchar.com);
 - B) Reason-to-Believe Letter, dated April 4, 2019, referencing the missing 48-Hour Notices (sent via overnight mail to the address of record).
4. I hereby certify that I have searched the Commission's public records and find Klobuchar for Minnesota filed the missing 48-Hour Notices with the Commission on August 23, 2018.
5. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 1st day of July, 2019.

Ben Holly for KDR
Kristin D. Roser
Chief, Compliance Branch
Reports Analysis Division
Federal Election Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

December 2, 2018

M BRIGID MCDONOUGH, TREASURER
KLOBUCHAR FOR MINNESOTA
PO BOX 4146
ST PAUL, MN 55104

Response Due Date
01/07/2019

IDENTIFICATION NUMBER: C00431353

REFERENCE: AMENDED OCTOBER QUARTERLY REPORT (07/26/2018 - 09/30/2018),
RECEIVED 10/25/2018

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 1 item(s):

- Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions (to include loans, in-kind contributions, and advances) received by your committee after the close of books for the 12 Day Pre-Primary Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee

KLOBUCHAR FOR MINNESOTA

Page 2 of 2

will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit <http://transition.fec.gov/rad/>. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1155.

Sincerely,

Vicki S Davis

Vicki Davis
Senior Campaign Finance Analyst
Reports Analysis Division

Missing 48-Hour Notices**KLOBUCHAR FOR MINNESOTA (C00431353)**

Contributor Name	Date	Amount	Election
Rudd, David	7/30/18	\$1,000.00	P2018
Ratner, Mary	7/31/18	\$1,950.00	P2018
Naylor, John	8/1/18	\$2,250.00	G2018
Powell Jobs, Laurene Powell	8/1/18	\$2,700.00	P2018
Powell Jobs, Laurene Powell	8/1/18	\$2,700.00	G2018
Becker, James	8/2/18	\$1,000.00	P2018
Maritz, Kristine Meredith	8/3/18	\$1,000.00	G2018
American Dental PAC	8/7/18	\$2,500.00	P2018
AMERICAN POSTAL WORKERS UNION AFL-CIO	8/7/18	\$2,500.00	P2018
ASSOCIATION OF EQUIPMENT MANUFACTURERS PAC	8/7/18	\$1,000.00	G2018
CAPELLA EDUCATION COMPANY PAC	8/7/18	\$1,400.00	P2018
CAPELLA EDUCATION COMPANY PAC	8/7/18	\$2,600.00	G2018
Conlin, Jan M	8/7/18	\$1,300.00	G2018
Conlin, Jan M	8/7/18	\$1,700.00	P2018
Cutler, Kenneth Lance	8/7/18	\$2,700.00	P2018
ECOLAB INC. POLITICAL ACTION COMMITTEE	8/7/18	\$5,000.00	G2018
FEDEX CORPORATION POLITICAL ACTION COMMITTEE (FEDEXPAC)	8/7/18	\$1,000.00	P2018
INGRAM BARGE COMPANY POLITICAL ACTION COMMITTEE	8/7/18	\$1,000.00	G2018
NATIONAL MULTIFAMILY HOUSING COUNCIL POLITICAL ACTION COMMITTEE	8/7/18	\$1,000.00	G2018
Saario, Terry T	8/7/18	\$1,000.00	P2018
STARKEY PAC	8/7/18	\$1,000.00	P2018
STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY FEDERAL POLITICAL ACTION COMMITTEE	8/7/18	\$1,000.00	P2018
TCF PAC	8/7/18	\$2,000.00	P2018
UNITED MINE WORKERS OF AMERICA - COAL MINERS POLITICAL ACTION COMMITTEE	8/7/18	\$1,000.00	P2018
Waldron, Robert Francis	8/7/18	\$2,700.00	G2018
Wells, John	8/7/18	\$2,700.00	P2018

18062724065

DECLARATION OF RHIANNON MAGRUDER

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) The principal campaign committee of a candidate must file notifications disclosing contributions of \$1,000 or more which are received after the 20th day but more than 48 hours before an election. These notifications (also called 48-Hour Notices) must be filed with the Secretary of the Senate within 48 hours of the committee's receipt of the contribution(s).
- 3) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
 - a) 48-Hour Notice filed by Klobuchar for Minnesota and M. Brigid McDonough, in her official capacity as Treasurer, and received on August 23, 2018.
 - b) Form 99 (Miscellaneous Electronic Submission) filed by Klobuchar for Minnesota and M. Brigid McDonough, in her official capacity as Treasurer, and received on January 7, 2019.
 - c) Form 99 (Miscellaneous Text Submission) filed by Klobuchar for Minnesota and M. Brigid McDonough, in her official capacity as Treasurer, and received on January 29, 2019.
- 4) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 10th day of July, 2019.

Rhiannon Magruder
Rhiannon Magruder
Reviewing Officer
Office of Administrative Review
Federal Election Commission

48-HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Form 278e for Instructions)

Use this form to report contributions (including loans) of \$1000 or more received within 48 hours of the election.

PAGE 1
RECEIVED
SECRETARY OF THE SENATE
PUBLIC RECORDS

2018 AUG 23 AM 11:48

1. NAME OF COMMITTEE OR FULL Klobuchar for Minnesota			
ADDRESS (Number, Street, Apt. #, PO Box, etc.) PO Box 4148			
CITY St Paul	STATE MN	ZIP CODE 55101	
2. NAME OF CANDIDATE Klobuchar, Amy...		3. OFFICE RECEIVED (State and District) Senate MN 00	4. FISCAL IDENTIFICATION NUMBER 00001303
5. IDENTIFY AN ADDRESSEE <input checked="" type="checkbox"/> NO, IT IS NOT A FUND <input type="checkbox"/> IF YES, IS NOTICE F. 50102			
A. FULL NAME American Dental PAC		Name of Employer	Date (month, day, year)
MAILING ADDRESS 1111 14TH STREET, NW SUITE 1100		Transaction ID : C22865220	Amount 2500.00
CITY WASHINGTON	STATE DC	ZIP CODE 20005	Occupation
B. FULL NAME AMERICAN POSTAL WORKERS UNION AFL-CIO		Name of Employer	Date (month, day, year)
MAILING ADDRESS 1300 L STREET NW		Transaction ID : C22865233	Amount 2500.00
CITY WASHINGTON	STATE DC	ZIP CODE 20005	Occupation
C. FULL NAME ASSOCIATION OF EQUIPMENT MANUFACTURERS PAC		Name of Employer	Date (month, day, year)
MAILING ADDRESS 1000 VERMONT AVENUE, NW SUITE 450		Transaction ID : C22865223	Amount 1000.00
CITY WASHINGTON	STATE DC	ZIP CODE 20005	Occupation
D. FULL NAME Becker, James...		Name of Employer Not Employed	Date (month, day, year)
MAILING ADDRESS 84 Junior Road		Transaction ID : C22804460A	Amount 1000.00
CITY Bolton	STATE MA	ZIP CODE 02478	Occupation Not Employed
E. FULL NAME CAPELLA EDUCATION COMPANY PAC		Name of Employer	Date (month, day, year)
MAILING ADDRESS 225 SOUTH 6TH STREET 9TH FLOOR		Transaction ID : C22865230	Amount 1400.00
CITY MINNEAPOLIS	STATE MN	ZIP CODE 55402	Occupation
SIGNATURE (Required) McDonough, M. David		DATE 08/08/2018	For further information contact: Federal Election Commission 990 E Street, NW Washington, DC 20463 Toll Free 800-424-9530, Local 202-694-1100

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Any information required from recipient and not provided by the donor, the Federal Election Commission will not be able to verify the accuracy of the information provided. The Commission will not accept the information if it is not provided by the donor.

FEC FORM 6
01/01/2018

201808230200714263

110000000001

PAGE 2 of 6

RECEIVED
SECRETARY OF THE SENATE
PUBLIC RECORDS

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Instructions for Instructions)

2018 AUG 23 AM 11:48

Do not report to the public any contributions or loans received if \$1,000 or less, regardless of whether the contribution is made by an individual or a corporation.

1. NAME OF COMMITTEE IN FULL Klobuchar for Minnesota			
ADDRESS (Number and street) PO Box 4145			
CITY, STATE, AND ZIP CODE St Paul MN 55101			
2. NAME OF CANDIDATE Klobuchar, Amy...		3. OFFICE (Senate or House) (Number) Senate MN 05	4. FEED IDENTIFICATION NUMBER C00431353
5. IS THIS AN ADDITIONAL <input checked="" type="checkbox"/> NO, THIS IS A FILED <input type="checkbox"/> (Check one) (If checked, see instructions)			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE CAPELLA EDUCATION COMPANY PAC 225 SOUTH 10TH STREET 0TH FLOOR MINNEAPOLIS MN 55402		Name of Employer Transaction ID: C22855231 Occupation Government	Date (month, day, year) 08/07/2018 Amount 2500.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE Carp. Bert. W. 601 Pennsylvania Ave. Washington DC 20004		Name of Employer Alignment Government & politics Transaction ID: C22854022A Occupation Government relations	Date (month, day, year) 08/08/2018 Amount 200.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE Carp. Bert. W. 601 Pennsylvania Ave Washington DC 20004		Name of Employer Alignment Government & politics Transaction ID: C22855205A Occupation Government relations	Date (month, day, year) 08/08/2018 Amount 800.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE Conlin, Jan, M. 710 Knox Ave S Minneapolis MN 55403-2833		Name of Employer Crest Conlin LLP Transaction ID: C22855212 Occupation Attorney	Date (month, day, year) 08/07/2018 Amount 1700.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE Conlin, Jan, M. 1710 Knox Ave Minneapolis MN 55403-2833		Name of Employer Crest Conlin LLP Transaction ID: C22855213 Occupation Attorney	Date (month, day, year) 08/07/2018 Amount 1300.00

continuation page

Any person who files this notice and who receives the notice from the Federal Election Commission shall not be liable for any civil or criminal liability for any contribution made to the committee in violation of the law, provided that the notice is filed in accordance with the instructions to the public.

FEC FORM 6
(Revised 07/2017)

201808230200714264

8704227700001

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SECRETARY OF THE SENATE
PUBLIC RECORDS

2018 AUG 23 AM 11:48

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Figure 8.1 for the instructions)

អរ ព្រះបិតា ឯង ប្រាកដ! ឯងបានប្រគល់ជូនពួកយើងនូវអំណាចក្នុងឈ្មោះ ព្រះអង្គ យេស៊ូវ គ្រីស្ទ ដើម្បីយើងអាចប្រកាសអំពីព្រះអង្គ ដល់អ្នកដទៃបាន។

1 NAME OF COMMITTEE IN FULL Klobuchar for Minnesota			
ADDRESS (number and street) PO Box 4148			
CITY, STATE, AND ZIP CODE St Paul MN 55104			
2. NAME OF CANDIDATE Klobuchar, Amy, . .		3. OFFICE (House and Number) Senate MN 01	
		4. FEEDBACK/COMPLAINT NUMBER C00431353	
5. IS THIS A <input checked="" type="checkbox"/> NO, THIS IS A <input type="checkbox"/> FINANCIAL			
6. FULL NAME, MAILING ADDRESS AND ZIP CODE Cutler, Kenneth, Lance, . 19 Circle W Edina MN 55435-1312			
Name of Employer Dorsey & Whitney Transaction ID : C22865214 Occupation Attorney		Date (month, day, year) 08/07/2018	Amount 2700.00
7. FULL NAME, MAILING ADDRESS AND ZIP CODE ECOLAB INC. POLITICAL ACTION COMMITTEE 370 Wadsworth St. Paul MN 55102			
Name of Employer Transaction ID : C22865221 Occupation		Date (month, day, year) 08/07/2018	Amount 5000.00
8. FULL NAME, MAILING ADDRESS AND ZIP CODE FEDEX CORPORATION POLITICAL ACTION COMMITTEE (FEDEXPAC) 942 S SHADY GROVE ROAD MEMPHIS TN 38120			
Name of Employer Transaction ID : C22865232 Occupation		Date (month, day, year) 08/07/2018	Amount 1000.00
9. FULL NAME, MAILING ADDRESS AND ZIP CODE INGRAM BARGE COMPANY POLITICAL ACTION COMMITTEE ONE BELLE MEADE PL 4400 HARDING RD NASHVILLE TN 37205			
Name of Employer Transaction ID : C22865228 Occupation		Date (month, day, year) 08/07/2018	Amount 1000.00
10. FULL NAME, MAILING ADDRESS AND ZIP CODE Maritz, Kristine, Meredith. 5360 181 Ave Minneapolis MN 55418			
Name of Employer MCCD Transaction ID : C22864538A Occupation Consultant		Date (month, day, year) 01/08/2018	Amount 1000.00

[illegible]FEC FORM 6
(Revised 07/2011)

201808230200714265

1-800-275-2700

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Instructions on the back of this form)

This form is used to report all contributions (including loans) of \$1000 or more received within 48 hours of the election.

PAGE 115
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SECRETARY OF THE SENATE
PUBLIC RECORDS

2018 AUG 23 AM 11:48

1. NAME OF COMMITTEE OR FULL Klobuchar for Minnesota		2. OFFICE BOUGHT (Check one) Senate MN 00		4. VERIFICATION NUMBER C00431353	
3. ADDRESS (Number and Street) PO Box 4146					
CITY, STATE, AND ZIP CODE St Paul MN 55104		continuation page			
5. NAME OF CANDIDATE Klobuchar, Amy...		6. YES: IF PAID BY THE NOTICE TO YOU			
7. YES: IF PAID BY THE NOTICE TO YOU					
A. FULL NAME, MAILING ADDRESS AND ZIP CODE Naylor, John. 2408 Lafayette Road Wayzata MN 55391		Name of Employer Medica Transaction ID: C22805258A Occupation Executive		Date (month, day, year) 08/08/2018 Amount 2250.00	
B. FULL NAME, MAILING ADDRESS AND ZIP CODE Naylor, John. 2408 Lafayette Road Wayzata MN 55391		Name of Employer Medica Transaction ID: C22804291A Occupation Executive		Date (month, day, year) 08/08/2018 Amount 450.00	
C. FULL NAME, MAILING ADDRESS AND ZIP CODE NATIONAL MULTIFAMILY HOUSING COUNCIL POLITICAL ACTION COMMITTEE 1775 EYE ST. NW SUITE 1100 WASHINGTON DC 20006		Name of Employer Emerson Collective Transaction ID: C22803223 Occupation President		Date (month, day, year) 08/07/2018 Amount 1000.00	
D. FULL NAME, MAILING ADDRESS AND ZIP CODE Powell Jobs, Laurene. 16 Bryant Street #260 Palo Alto CA 94301		Name of Employer Emerson Collective Transaction ID: C22804289A Occupation President		Date (month, day, year) 08/08/2018 Amount 2700.00	
E. FULL NAME, MAILING ADDRESS AND ZIP CODE Powell Jobs, Laurene. 555 Bryant St Ste 2250 Palo Alto CA 94301		Name of Employer Emerson Collective Transaction ID: C22803263A Occupation President		Date (month, day, year) 08/08/2018 Amount 2700.00	

Any false or misleading information furnished under this Federal Election Campaign Act may be subject to criminal sanctions under 18 U.S.C. 224 and 225, and civil penalties under 2 U.S.C. 4370a.

FEC FORM 6
(11/2008 07/2014)

201808230200714256

201808230200714256

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PUBLIC RECORDS

2018 AUG 23 AM 11:48

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(50) **Pravara Nalla for Irrigation**

[illegible]

1. NAME OF COMMITTEE IN FULL Klobuchar for Minnesota			
ADDRESS (Number and Street) PO Box 4140			
CITY, STATE, and ZIP CODE St Paul MN 55104			
3. NAME OF CANDIDATE Klobuchar, Amy...		3. OFFICE BOUGHT (Job or District) Senate MN OF	
		4. FEET IDENTIFICATION NUMBER C00451353	
5. IS THIS AN ELECTION? <input checked="" type="checkbox"/> NO, IT IS <input type="checkbox"/> YES, IT IS AN ELECTION			
6. FULL NAME, MAILING ADDRESS AND ZIP CODE Ratner, Mary, 220 Mariona Dr. Menlo Park CA 94020		Name of Employer Not employed Transaction ID : C22804669A Occupation Not employed	
6. FULL NAME, MAILING ADDRESS AND ZIP CODE Rudd, David, 3846 Macomb St. NW Washington DC 20016		Name of Employer Palmetto Group Transaction ID : C22864030A Occupation consultant	
6. FULL NAME, MAILING ADDRESS AND ZIP CODE Saario, Terry, T., 34 Park Ln Minneapolis MN 55416		Name of Employer N/A Transaction ID : C22853215 Occupation Retired	
6. FULL NAME, MAILING ADDRESS AND ZIP CODE STARKEY PAC 1000 WASHINGTON AVE S EDEN PRAIRIE MN 55344		Name of Employer Transaction ID : C22865210 Occupation	
6. FULL NAME, MAILING ADDRESS AND ZIP CODE STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY FEDERAL POLITICAL ACTION COMMITTEE ONE STATE FARM PLAZA C/O MARK SCHWAMBERGER, TREASURER, IL SPRINGTOWN IL 61710		Name of Employer Transaction ID : C22865220 Occupation	

Any information or data that might be used to identify the individual in the Federal Election Commission's database is not to be used for any other purpose. The information is to be used only for the purpose of identifying the individual in the database. The information is to be used only for the purpose of identifying the individual in the database. The information is to be used only for the purpose of identifying the individual in the database.

FEC FORM 6
(Revised 07/2011)

20180823020714267

1000227001

ISO 9001:2015 Certified for Implementation

[illegible]

1. NAME OF COMMITTEE IN FULL Klobuchar for Minnesota ADDRESS (number and street) PO Box 1149 CITY, STATE, AND ZIP CODE St Paul MN 55104				continuation page 4. FIC DISCLOSURE NUMBER C00431553
2. NAME OF CANDIDATE Klobuchar, Amy...		3. OFFICE SOUGHT (House and District) Senate MN 00		
5. ETHNIC NUMBER <input checked="" type="checkbox"/> YES; IF YES, AT: <input type="checkbox"/> IT AND: <input type="checkbox"/> IS NONE F ID ON				
A. FULL NAME, MAILING ADDRESS AND ZIP CODE TCF PAC 801 MARQUETTE AVENUE MINNEAPOLIS MN 55402		Name of Employer Transaction ID: C22865217 Occupation	Date (month, day, year) 08/07/2018	Amount 2000.00
B. FULL NAME, MAILING ADDRESS AND ZIP CODE UNITED MINE WORKERS OF AMERICA - COAL MINERS POLITICAL ACTION COMMITTEE 18354 QUANTICO GATEWAY DR SUITE 200 TRIANGLE VA 22172		Name of Employer Transaction ID: C22865227 Occupation	Date (month, day, year) 08/07/2018	Amount 1000.00
C. FULL NAME, MAILING ADDRESS AND ZIP CODE Waldron, Robert, Francis, 6718 Point Drive Minneapolis MN 55435		Name of Employer Can /a Corliss Transaction ID: C22865216 Occupation Executive	Date (month, day, year) 08/07/2018	Amount 2700.00
D. FULL NAME, MAILING ADDRESS AND ZIP CODE Wells, John, c/o Singer Burke Zimany LLP 6346 Bethesda Blvd, Building 4 Escrow CA 91318		Name of Employer John Wells Productions Transaction ID: C22865218 Occupation Producer	Date (month, day, year) 08/07/2018	Amount 2700.00
E. FULL NAME, MAILING ADDRESS AND ZIP CODE		Name of Employer Occupation	Date (month, day, year)	Amount

FEC FORM 6
(Revised 07/2011)

FEC FORM 6
(Revised 07/2011)

892714268

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SECRETARY OF THE SENATE
PUBLIC RECORDS
2018 AUG 23 AM 11:48

FAX COVER SHEET

TO	Secretary of the Senate, Office of Public Records
COMPANY	
FAX NUMBER	12022241851
FROM	Rebecca Groen
DATE	2018-08-08 18:58:07 GMT
RE	48 Hour Notice

COVER MESSAGE

Attached please find the 48 hour notice form for Klobuchar for Minnesota, FEC
ID C00431353

201808230200714269

WOODNUNN0001

8/22/2018

Gmail - Successful transmission to 12022241851. Re: 48 Hour Notice

Attachment 4
9 of 20



RECEIVED
SECRETARY OF THE SENATE
PUBLIC RECORDS
2018 AUG 23 AM 11:48

Successful transmission to 12022241851. Re: 48 Hour Notice

send@mail.efax.com <send@mail.efax.com>
To: groen.becky@gmail.com

Wed, Aug 8, 2018 at 2:03 PM



Hello Rebecca,

Your fax was successfully sent to 12022241851 by eFax.

Fax Details

Date: 2018-08-08 19:03:34 (GMT)

Number of Pages: 7

Length of Transmission: 276 seconds

Receiving Machine Fax ID: 202-224-1851

If you have any questions, please visit our online help center or contact Customer Support.

Thank you for choosing eFax.

Sincerely,
The eFax Team

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8922 Hollywood Blvd., Los Angeles, CA 90028

This account is subject to the terms listed in the eFax Customer Agreement.

<https://mail.google.com/mail/u/1?ik=2313ae37b1&view=pt&search=all&permmsgid=msg-f%3A1608258701895135361&siml=msg-f%3A16082587018...> 1/2

201808230200714270

201808230200714270

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (In Full)
Klobuchar for Minnesota

FEC IDENTIFICATION NUMBER
C00431353

Mailing Address PO Box 4146

City	State	ZIP Code
Saint Paul	MN	55104

To whom it may concern,

This letter is in response to the Commission's request for additional information regarding Klobuchar for Minnesota's October quarterly report.

Pursuant to the previous requirement that Senate committees file disclosure reports with the Secretary of the Senate, the Committee submitted a 48 hour notice report on August 8th to the Secretary of the Senate via fax, which included all of the donations cited in the Commission's letter. The Committee received a confirmation of the fax transmittal from eFax on August 8, 2018 (attached to the August 8 report), and has no reason to believe the fax was not delivered on that date. The Committee later discovered that the report had not been posted to the FEC's public site, and contacted the Secretary of the Senate with concerns that the report may have been misplaced. Following communications with the Secretary of the Senate, the 48-hour reports originally filed with the Senate on August 8, 2018 appeared on the Commission's website on August 23, 2018.

The Committee will submit separately copies of the original filing, as well as confirmation of the fax transmission on August 8th.

Thank you for your assistance in resolving this matter.

Sincerely,
Rebecca Groen

RECEIVED
FEC MAIL CENTER
2019 FEB -4 PM 12: 08

Vicki Davis
Reports Analysis Division
Federal Election Commission
1050 1st Street NE
Washington, DC 20463

Dear Ms Davis,

This is in response to the Commission's request for additional information regarding Klobuchar for Minnesota's October Quarterly report. On January 7th, the committee submitted a response to the FEC via electronic filing. In addition, I wanted to provide copies of the original 48 hour notice, as well as the email from the Efax delivery service, confirming delivery of the original report on August 8th.

Thank you again for your assistance in resolving this matter.

Sincerely,


Rebecca Groen

MISCELLANEOUS TEXT (FEC Form 99)

NAME OF COMMITTEE (In Full)
Klobuchar for Minnesota

FEC IDENTIFICATION NUMBER
C00431353

Mailing Address **PO Box 4146**

City State ZIP Code
Saint Paul MN 55104

RECEIVED
FEC MAIL CENTER
2019 FEB -4 PM 12:08

To whom it may concern,

This letter is in response to the Commission's request for additional information regarding Klobuchar for Minnesota's October quarterly report.

Pursuant to the previous requirement that Senate committees file disclosure reports with the Secretary of the Senate, the Committee submitted a 48 hour notice report on August 8th to the Secretary of the Senate via fax, which included all of the donations cited in the Commission's letter. The Committee received a confirmation of the fax transmittal from eFax on August 8, 2018 (attached to the August 8 report), and has no reason to believe the fax was not delivered on that date. The Committee later discovered that the report had not been posted to the FEC's public site, and contacted the Secretary of the Senate with concerns that the report may have been misplaced. Following communications with the Secretary of the Senate, the 48-hour reports originally filed with the Senate on August 8, 2018 appeared on the Commission's website on August 23, 2018.

The Committee will submit separately copies of the original filing, as well as confirmation of the fax transmission on August 8th.

Thank you for your assistance in resolving this matter.

Sincerely,
Rebecca Groen

FAX COVER SHEET

TO	Secretary of the Senate, Office of Public Records
COMPANY	
FAX NUMBER	12022241851
FROM	Rebecca Groen
DATE	2018-08-08 18:58:07 GMT
RE	48 Hour Notice

COVER MESSAGE

Attached please find the 48 hour notice form for Klobuchar for Minnesota, FEC
ID C00431353

Find Reverse Side by Insulating

ಈ 60,000-ನು 10,000-ನು ಸ್ವಯಂಸೇವಕರಾಗಿ (ಗ್ರಾಂಥಿಕರು) ಇತರರಿಗೆ 5:1000-ನು ಇವರು. ಇವರನ್ನು ಹೊರತು ಪಡಿಸಿದರೆ 50,000-ನು ಸ್ವಯಂಸೇವಕರಾಗಿ

1. NAME OF COMMITTEE OR FULL Klobuchar for Minnesota			
ADDRESS (include zip code) PO Box 4198			
CITY St Paul		STATE MN	ZIP CODE 55104
2. NAME OF CANDIDATE Klobuchar, Amy, ..		3. OFFICE SOUGHT (S) and COUNTY Senate MN 00	4. FCO IDENTIFICATION NUMBER C00431353
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON ____ / ____ / ____			
A. FULL NAME American Dental PAC		Name of Employer Transaction ID : C22855220 Occupation	Date (month, day, year) 02/07/2018 Amount 2500.00
MAILING ADDRESS 1111 14TH STREET, NW SUITE 1100 CITY WASHINGTON		STATE DC	ZIP CODE 20005
B. FULL NAME AMERICAN POSTAL WORKERS UNION AFL-CIO		Name of Employer Transaction ID : C22855233 Occupation	Date (month, day, year) 03/07/2018 Amount 2500.00
MAILING ADDRESS 1300 L STREET NW CITY WASHINGTON		STATE DC	ZIP CODE 20005
C. FULL NAME ASSOCIATION OF EQUIPMENT MANUFACTURERS PAC		Name of Employer Transaction ID : C22855223 Occupation	Date (month, day, year) 02/07/2018 Amount 1000.00
MAILING ADDRESS 1000 VERMONT AVENUE, NW SUITE 450 CITY WASHINGTON		STATE DC	ZIP CODE 20005
D. FULL NAME Becker, James, ..		Name of Employer Not Employed Transaction ID : C22854406A Occupation Not Employed	Date (month, day, year) 03/03/2018 Amount 1000.00
MAILING ADDRESS 84 Jasper Road CITY Belmont		STATE MA	ZIP CODE 02478
E. FULL NAME CAPELLA EDUCATION COMPANY PAC		Name of Employer Transaction ID : C22855230 Occupation	Date (month, day, year) 03/07/2018 Amount 1400.00
MAILING ADDRESS 223 SOUTH 6TH STREET 9TH FLOOR CITY MINNEAPOLIS		STATE MN	ZIP CODE 55402
SIGNATURE (optional) McDermough, M. Bridget, ..		DATE 03/08/2018	For further information contact: Federal Election Commission 990 E Street, NW, Washington, DC 20469 Toll Free 800-424-9530, Local 202-694-1100

[illegible]

FEC FORM 6
(Revised 01/2018)

2018

**48 HOUR NOTICE OF
CONTRIBUTIONS/LOANS RECEIVED**

(See reverse side for instructions)

To be used to report all contributions (including loans) of \$1000 or more received within 48 hours of the election.

1. NAME OF COMMITTEE OR FULL Klobuchar for Minnesota			
ADDRESS (street and apt) PO Box 4146			
CITY, STATE, AND ZIP CODE St Paul MN 55104		continuation page	
2. NAMES OF CANDIDATE Klobuchar, Amy, ,	3. OFFICE BOUGHT? (State and District) Senate MN 00	4. FED IDENTIFICATION NUMBER C00431353	
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> YES, THIS IS A NEW RE-USE <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON _____ / _____ / _____			
6. FULL NAME, MAILING ADDRESS AND ZIP CODE CAPELLA EDUCATION COMPANY PAC 225 SOUTH 6TH STREET 9TH FLOOR MINNEAPOLIS MN 55402		Name of Employer Transaction ID : C22865231 Occupation	Date (month, day, year) 03/07/2018 Amount 2600.00
7. FULL NAME, MAILING ADDRESS AND ZIP CODE Carp, Bert, W., , 601 Pennsylvania Ave. Washington DC 20004		Name of Employer Alignment Government Strategies Transaction ID : C22864022A Occupation Government relations	Date (month, day, year) 08/06/2018 Amount 200.00
8. FULL NAME, MAILING ADDRESS AND ZIP CODE Carp, Bert, W., , 601 Pennsylvania Ave. Washington DC 20004		Name of Employer Alignment Government Strategies Transaction ID : C22864365A Occupation Government relations	Date (month, day, year) 08/06/2018 Amount 800.00
9. FULL NAME, MAILING ADDRESS AND ZIP CODE Conlin, Jan, M., , 1710 Knox Ave S Minneapolis MN 55403-2833		Name of Employer Crest Conlin LLP Transaction ID : C22865212 Occupation Attorney	Date (month, day, year) 03/07/2018 Amount 1700.00
10. FULL NAME, MAILING ADDRESS AND ZIP CODE Conlin, Jan, M., , 1710 Knox Ave S Minneapolis MN 55403-2833		Name of Employer Crest Conlin LLP Transaction ID : C22865213 Occupation Attorney	Date (month, day, year) 03/07/2018 Amount 1300.00

Any contribution reported on this notice and verification filed under the Federal Election Campaign Act may not be used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any person contributing to such contributions for such contributions.

FEC FORM 6
(Revised 07/2011)

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Response 5510 for instructions)

To be used to report all contributions (including loans) of \$1,000 or more received within 20 days of the election.

1. NAME OF COMMITTEE IN FULL Klobuchar for Minnesota			
ADDRESS (number and street) PO Box 4141			
CITY, STATE, AND ZIP CODE St Paul MN 55104			
2. NAME OF CANDIDATE Klobuchar, Amy...		3. OFFICE GOVERNED (State and District) Senate MN 01	
		4. PEO IDENTIFICATION NUMBER C00431353	
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE NOTICE FILED ON: / /			
A. FULL NAME, MAILING ADDRESS AND ZIP CODE Culler, Kenneth, Lance, . 19 Circle W Edina MN 55438-1312		Name of Employer: Dorsey R Whitney Transaction ID : C22865214 Occupation Attorney	
		Date (month, day, year) 03/07/2018	
		Amount 2700.00	
B. FULL NAME, MAILING ADDRESS AND ZIP CODE ECOLAB INC. POLITICAL ACTION COMMITTEE 370 Watouska St. Paul MN 55102		Name of Employer: Transaction ID : C22865221 Occupation	
		Date (month, day, year) 08/07/2018	
		Amount 5000.00	
C. FULL NAME, MAILING ADDRESS AND ZIP CODE FEDEX CORPORATION POLITICAL ACTION COMMITTEE (FEDEXPAC) 942 S SHADY GROVE ROAD MEMPHIS TN 38120		Name of Employer: Transaction ID : C22865232 Occupation	
		Date (month, day, year) 02/07/2018	
		Amount 1000.00	
D. FULL NAME, MAILING ADDRESS AND ZIP CODE INGRAM BARGE COMPANY POLITICAL ACTION COMMITTEE ONE BELLE MEADE PL 4000 HARDING RD NASHVILLE TN 37205		Name of Employer: Transaction ID : C22865228 Occupation	
		Date (month, day, year) 03/07/2018	
		Amount 1000.00	
E. FULL NAME, MAILING ADDRESS AND ZIP CODE Maritz, Kristine, Meredith, . 5340 1st Ave S Minneapolis MN 55419		Name of Employer: MCCO Transaction ID : C22864538A Occupation Consultant	
		Date (month, day, year) 09/06/2018	
		Amount 1000.00	

continuation page

Any information supplied by this report and its contents filed under the Federal Election Campaign Act may not be used by any person for the purpose of soliciting contributions or for other political purposes other than using the name and address of any political committee to solicit contributions from such committee.

FEC FORM 6
(Post 10-07-2011)

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(See Reverse Side for Instructions)

To be filed to report all contributions (including loans) of \$1,000 or more, received within 48 hours of the election.

1. NAME OF COMMITTEE OR FULL Klobuchar for Minnesota			
ADDRESS (street and city) PO Box 4145			
CITY, STATE, AND ZIP CODE St Paul MN 55104		continuation page	
2. NAME OF CANDIDATE Klobuchar, Amy, . .		3. OFFICE SOUGHT (state and district) Senate MN 00	
4. FEC IDENTIFICATION NUMBER C80431453			
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> YES, THIS IS A NEW FILING <input type="checkbox"/> YES, IT AMENDS THE PREVIOUS FILING			
6. FULL NAME, MAILING ADDRESS AND ZIP CODE			
Naylor, John, . . 2408 Lafayette Road Wayzata MN 55391		Name of Employer Medica Transaction ID : C22805258A Occupation Executive	
Date (month, day, year) 03/05/2018		Amount 2250.00	
7. FULL NAME, MAILING ADDRESS AND ZIP CODE			
Naylor, John, . . 2408 Lafayette Road Wayzata MN 55391		Name of Employer Medica Transaction ID : C22864291A Occupation Executive	
Date (month, day, year) 03/05/2018		Amount 450.00	
8. FULL NAME, MAILING ADDRESS AND ZIP CODE			
NATIONAL MULTIFAMILY HOUSING COUNCIL POLITICAL ACTION COMMITTEE 1775 EYE ST. NW SUITE 1100 WASHINGTON DC 20008		Name of Employer Transaction ID : C22885222 Occupation 	
Date (month, day, year) 03/07/2018		Amount 1000.00	
9. FULL NAME, MAILING ADDRESS AND ZIP CODE			
Powell Jobs, Laurene, . . 555 Bryant Street #250 Palo Alto CA 94301		Name of Employer Emerson Collective Transaction ID : C22864289A Occupation President	
Date (month, day, year) 03/08/2018		Amount 2700.00	
10. FULL NAME, MAILING ADDRESS AND ZIP CODE			
Powell Jobs, Laurene, . . 555 Bryant Street #250 Palo Alto CA 94301		Name of Employer Emerson Collective Transaction ID : C22865243A Occupation President	
Date (month, day, year) 03/08/2018		Amount 2700.00	

Any filer who is required to file this notice must file it with the Federal Election Commission. This notice is subject to review by the Commission for accuracy and completeness. Filers who fail to file this notice or who file an inaccurate or incomplete notice may be subject to civil penalties. Filers who fail to file this notice or who file an inaccurate or incomplete notice may be subject to civil penalties. Filers who fail to file this notice or who file an inaccurate or incomplete notice may be subject to civil penalties.

FEC FORM 6
(Rev. 06/2017)

20180308 10:40:00 AM

48 HOUR NOTICE OF CONTRIBUTIONS/LOANS RECEIVED

(Use Reverse Side for Instructions)

To be used to report all contributions (including loans) of \$1000 or more, received within 48 days of the election.

1. NAME OF COMMITTEE IN FULL Klobuchar for Minnesota			
ADDRESS (number and street) P.O. Box #140 			
CITY, STATE, AND ZIP CODE St Paul MN 55104		continuation page	
2. NAME OF CANDIDATE Klobuchar, Amy.,		3. OFFICE SOUGHT (State and District) Senate MN 00	
4. IDENTIFICATION NUMBER C00431353			
5. IS THIS AN AMENDMENT? <input checked="" type="checkbox"/> NO THIS IS A NEW FILING <input type="checkbox"/> YES IT AMENDS THE NOTICE FILED ON: _____			
6. FULL NAME, MAILING ADDRESS AND ZIP CODE			
Name of Employer Not employed Transaction ID : C22864089A Occupation Not employed		Date (month, day, year) 08/06/2018 Amount 2000.00	
Rainer, Mary, , 220 Marmona Dr. Mendota Park CA 94029		Name of Employer Palmetto Group Transaction ID : C22864030A Occupation consultant	
Date (month, day, year) 08/06/2018 Amount 1000.00		7. FULL NAME, MAILING ADDRESS AND ZIP CODE	
Name of Employer N/A Transaction ID : C22864215 Occupation Retired		Date (month, day, year) 08/07/2018 Amount 1000.00	
Rudd, David, , 3848 Macomb St. NW Washington DC 20016		Name of Employer Transaction ID : C22865218 Occupation 	
Date (month, day, year) 08/07/2018 Amount 1000.00		8. FULL NAME, MAILING ADDRESS AND ZIP CODE	
Name of Employer Transaction ID : C22865229 Occupation 		Date (month, day, year) 08/07/2018 Amount 1000.00	
STARKEY PAC 6600 WASHINGTON AVE S EDEN PRAIRIE MN 55344		Name of Employer Transaction ID : C22865229 Occupation 	
Date (month, day, year) 08/07/2018 Amount 1000.00		9. FULL NAME, MAILING ADDRESS AND ZIP CODE	
Name of Employer Transaction ID : C22865229 Occupation 		Date (month, day, year) 08/07/2018 Amount 1000.00	
STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY FEDERAL POLITICAL ACTION COMMITTEE ONE STATE FARM PLAZA CIO MARK SCHWANTERGER, TREASURER, BLOOMINGTON IL 61710		Name of Employer Transaction ID : C22865229 Occupation 	
Date (month, day, year) 08/07/2018 Amount 1000.00			

Any information reported with regard to contributions filed under the Federal Election Campaign Act may not be sold or used by any person for the purpose of soliciting contributions or for any other purpose other than using the name and address of any political committee to solicit contributions from such contributors.

FEC FORM 6
(Revised 07/2011)

19.40 Repair Skin Ice Induced

1. NAME OF COMMITTEE IN FULL Klobuchar for Minnesota	
ADDRESS (Number and Street) PO Box 4146	
CITY, STATE, AND ZIP CODE St Paul MN 55104	
2. NAME OF CANDIDATE Klobuchar, Amy, .	3. OFFICE SOUGHT (SEN, REP OR DEM) SEN MN 00

4. REC IDENTIFICATION NUMBER
C00431353

A. FULL NAME, MAILING ADDRESS AND ZIP CODE	Name of Employer	Date (month, day, year)	Amount
TCF PAC 601 MARQUEYTE AVENUE MINNEAPOLIS MN 55402	Transaction ID : C22805217 Occupation	09/07/2018	2000.00
6. FULL NAME, MAILING ADDRESS AND ZIP CODE UNITED MINE WORKERS OF AMERICA - COAL MINERS POLITICAL ACTION COMMITTEE 18354 QUANTICO GATEWAY DR SUITE 200 TRIANGLE VA 22172	Name of Employer Transaction ID : C22865227 Occupation	Date (month, day, year) 02/07/2018	Amount 1000.00
6. FULL NAME, MAILING ADDRESS AND ZIP CODE Waldron, Robert. Francis, . 6716 Point Drive Minneapolis MN 55435	Name of Employer Cameron's Office Transaction ID : C92865216 Occupation Executive	Date (month, day, year) 03/07/2018	Amount 2700.00
6. FULL NAME, MAILING ADDRESS AND ZIP CODE Wells, John, . . c/o Singer Burke Zimmer LLP 6345 Balboa Blvd. Building 4 Encino CA 91316	Name of Employer John Wells Productions Transaction ID : C22865218 Occupation Producer	Date (month, day, year) 03/07/2018	Amount 2700.00
6. FULL NAME, MAILING ADDRESS AND ZIP CODE	Name of Employer Occupation:	Date (month, day, year)	Amount

FEC FORM 6
(Rev. 05-17-2007)

8/22/2018

Gmail - Successful transmission to 12022241851. Re: 48 Hour Notice

Attachment 4
20 of 20



Rebecca Groen <groen.becky@gmail.com>

Successful transmission to 12022241851. Re: 48 Hour Notice

send@mail.efax.com <send@mail.efax.com>
To: groen.becky@gmail.com

Wed, Aug 8, 2018 at 2:03 PM



Hello Rebecca,

Your fax was successfully sent to 12022241851 by eFax.

Fax Details

Date: 2018-08-08 19:03:34 (GMT)

Number of Pages: 7

Length of Transmission: 276 seconds

Receiving Machine Fax ID: 202-224-1851

If you have any questions, please visit our online help center or contact Customer Support.

Thank you for choosing eFax.

Sincerely,
The eFax Team

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 2019

Kate Sawyer Keane
PerkinsCoie
700 13th Street, NW
Suite 600
Washington, DC 20005-3960

Klobuchar for Minnesota
C00431353
AF#: 3618

Dear Counsel:

On April 4, 2019, the Commission found reason to believe ("RTB") that Klobuchar for Minnesota and M. Brigid McDonough, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to timely file a 48-Hour Notice for 26 contributions totaling \$47,700 and made a preliminary determination that the civil money penalty was \$5,208 based on the schedule of penalties at 11 C.F.R. § 111.44.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission terminate the proceedings in accordance with 11 C.F.R. § 111.37(b) and close the file. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463 or via facsimile (202-208-3333). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1158 if you have any questions.

Sincerely,

Rhiannon Magruder
Rhiannon Magruder
Reviewing Officer
Office of Administrative Review



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2019 JUL 24 AM 9:03

July 24, 2019

MEMORANDUM

SENSITIVE

To: The Commission

Through: Alec Palmer *AP by HAH*
Staff Director

From: Patricia C. Orrock *PCO*
Chief Compliance Officer

Rhiannon Magruder *RM*
Reviewing Officer
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 3618 – Klobuchar for Minnesota and M. Brigid McDonough, in her official capacity as Treasurer (C00431353)

On April 4, 2019, the Commission found reason to believe (“RTB”) that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file 48-Hour Notices for 26 contributions totaling \$47,700 and made a preliminary determination that the civil money penalty was \$5,208 based on the schedule of penalties at 11 C.F.R. § 111.44.

On May 14, 2019, the Commission received their written response (“challenge”). After reviewing the challenge, the Reviewing Officer Recommendation (“ROR”) dated July 10, 2019 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission terminate the proceedings in accordance with 11 C.F.R. § 111.37(b) and close the file.

Within 10 days of transmittal of the recommendation, the respondents may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). To date, a response has not been received.

OAR Recommendations

1. Terminate the proceedings in AF# 3618 that Klobuchar for Minnesota and M. Brigid McDonough, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and close the file; and
2. Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) AF 3618
Final Determination Recommendation:)
Klobuchar for Minnesota and M. Brigid)
McDonough, in her official capacity as)
Treasurer (C00431353))

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on August 05, 2019, the Commission decided by a vote of 4-0 to take the following actions in AF 3618:

1. Terminate the proceedings in AF# 3618 that Klobuchar for Minnesota and M. Brigid McDonough, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and close the file.
2. Send the appropriate letter.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

8/6/19
Date

Laura E. Sinram

Laura E. Sinram
Acting Secretary and Clerk of the
Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 12, 2019

Kate Sawyer Keane
PerkinsCoie
700 13th Street, NW
Suite 600
Washington, DC 20005-3960

Klobuchar for Minnesota
C00431353
AF#: 3618

Dear Counsel:

On April 4, 2019, the Commission found reason to believe ("RTB") that Klobuchar for Minnesota and M. Brigid McDonough, in her official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to timely file a 48-Hour Notice for 26 contribution totaling \$47,700. By letter dated April 4, 2019, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$5,208 in accordance with the schedule of penalties at 11 C.F.R. § 111.44. On May 14, 2019, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission terminate the proceedings in accordance with 11 C.F.R. § 111.37(b) and close the file. The Reviewing Officer Recommendation was sent to you on July 10, 2019.

On August 5, 2019, the Commission adopted the Reviewing Officer's recommendation, and voted to terminate the proceedings with respect to 52 U.S.C. § 30104(a) and close the file. A copy of the Final Determination Recommendation is attached.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding this matter, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,

Ellen L. Weintraub

Ellen L. Weintraub
Chair

10002724100

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 3618

10002724101